

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSEPH FRIEL, individually and on behalf of
a class of all persons and entities similarly
situated,

Plaintiff,

v.

ETN AMERICA INC. and SHLOMI COHEN,

Defendants.

Civil Action No. 3:25-cv-00882-JKM

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

Defendant ETN America Inc. and Defendant Shlomi Cohen (collectively, “Defendants”) respectively move for a two-week extension to answer, move, or otherwise respond to Plaintiff Joseph Friel’s (“Plaintiff”) Complaint [ECF # 1]. Plaintiff does not oppose this Motion, and have consented to Defendants’ request for an extension. In support of the Motion, Defendants state as follows:

- 1) On May 19, 2025, Plaintiff initiated this putative class action by filing a Complaint in this Court, in which Plaintiff asserts claims individually and on behalf of the putative class. *See* ECF # 1.
- 2) Defendants were served on or about June 2, 2025. *Id.* at # 6.
- 3) On June 23, 2025, the undersigned counsel was retained and accordingly requested a two-week extension to respond to the Complaint. *Id.* at # 7.
- 4) This Court granted an extension to respond to the Complaint to July 8, 2025. *Id.* at # 8.
- 5) The Parties have undergone settlement negotiations and respectfully request an additional two-weeks to further explore an amicable resolution.

- 6) Plaintiff consents to a two-week extension.
- 7) Granting the foregoing Motion will not impact any currently set deadlines.
- 8) A Certificate of Concurrence attached hereto confirms that Defendants have sought concurrence in this Motion from Plaintiff, and that Plaintiff does not oppose this Motion.

WHEREFORE, Defendant ETN America Inc. and Defendant Shlomi Cohen respectfully request that the Court grant this unopposed motion and enter an order in the form provided extending the time within which Defendants may answer, move or otherwise respond to the Complaint through July 8, 2025.

Dated: July 8, 2025

Respectfully submitted,

/s/Corey M. Scher

Peter C. Buckley, Esquire
Corey M. Scher, Esquire
Fox Rothschild LLP
Two Commerce Square
2001 Market Street
Suite 1700
Philadelphia, PA 19103
Telephone: (215) 299-2000
Facsimile: (215) 299-2150
pbuckley@foxrothschild.com
cscher@foxrothschild.com

Attorneys for Defendants
ENT America Inc. and Shlomi Cohen